

<div data-bbox="819 261 1001 285" data-label="Section-Header"> <p>Comment Letter I57</p> </div> <div data-bbox="478 306 680 440" data-label="Text"> <p>Bill and Peggy Hopkins 41635 Old Hwy 80 Boulevard, CA 91905 (619) 766-4820</p> </div> <div data-bbox="218 487 348 511" data-label="Text"> <p>March 1, 2014</p> </div> <div data-bbox="218 558 510 693" data-label="Text"> <p>County of San Diego Attn: Mr. Robert Hingtgen, Planner 5510 Overland Ave, Suite 110 San Diego, CA 92123</p> </div> <div data-bbox="218 740 617 766" data-label="Text"> <p>Subject: Proposed Soitec Projects in Boulevard</p> </div> <div data-bbox="218 813 420 836" data-label="Text"> <p>Ladies and Gentlemen:</p> </div> <div data-bbox="218 847 938 1019" data-label="Text"> <p>I have lived in East County for over 40 years. I own property in Boulevard, Campo, and Pine Valley. When I first came here I drove on Old Hwy 80, as Interstate 8 had not yet been built. I remarked how beautiful the drive was from Jacumba through Boulevard into Pine Valley. I loved the unspoiled mountains views, the oak and pine trees, vegetation, animals and unbelievable sunrises and sunsets; the beautiful views unspoiled by commercialization and/or industrialization.. We bought this small ranch in Boulevard about 5 years ago thinking we would live out our lives here in this beautiful rural setting.</p> </div> <div data-bbox="218 1031 940 1118" data-label="Text"> <p>When we bought this property from Fannie Mae, nothing was disclosed about future commercial or industrial development of this area. We, the community, are against any commercial or industrial development. I have medical issues that require me to live in a quiet peaceful setting, which is part of the reason we moved here in the first place.</p> </div> <div data-bbox="218 1130 617 1156" data-label="Text"> <p>My issues against this type of development are:</p> </div> <div data-bbox="218 1166 938 1276" data-label="Text"> <p>1.FIRE THREAT. Solar panels run extremely hot, electrical equipment fails and catches fire, inverters run hot, and wiring overheats and catches fire. All of the above can be damaged by our local residents, birds of all types, rodents, rats, mice, kangaroo rats, gophers all love to gnaw through electrical equipment, starting fires. I base the above statement on my 40 plus years working for military as a Fire Marshall and as an</p> </div> <div data-bbox="724 505 928 639" data-label="Image"> </div> <div data-bbox="974 972 1026 993" data-label="Text"> <p>I57-1</p> </div> <div data-bbox="974 1195 1026 1218" data-label="Text"> <p>I57-2</p> </div>	<div data-bbox="1178 193 1780 233" data-label="Section-Header"> <h2>Response to Comment Letter I57</h2> </div> <div data-bbox="1289 269 1665 347" data-label="Text"> <p>Bill and Peggy Hopkins March 3, 2014</p> </div> <div data-bbox="1050 386 1923 464" data-label="Text"> <p>I57-1 This comment is introductory in nature and does not raise a significant environmental issue.</p> </div> <div data-bbox="1186 501 1923 745" data-label="Text"> <p>The County of San Diego (County) acknowledges the commenter's opposition to the Proposed Project. The information in this comment letter will be provided in the Final Program Environmental Impact Report (FPEIR) for review and consideration by the decision makers.</p> </div> <div data-bbox="1050 786 1923 1408" data-label="Text"> <p>I57-2 Studies were conducted during the preparation of the Rugged and Tierra del Sol solar farms' Fire Protection Plans (FPP) that evaluated the CPV tracker materials, function, and actual operation. A working CPV tracker was visited during the height of the day to determine what changes in air temperature were realized in the vicinity of the CPV tracker. There were no discernible air temperature changes. Temperatures were higher directly beneath the tracker, but the temperature decreased rapidly as the distance from the back of the CPV panel increased. This panel includes dry mulch beneath it, and at ground level, temperatures were lower than surrounding open areas exposed directly to the sun. Based on that study and on information provided by the manufacturer's engineers, no</p> </div>
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<p>Engineer for FAA, maintaining underground and high voltage utilities at San Diego airports.</p> <p>FAA requirements far exceed electrical code for materials, installation, and mechanical protection than these Soitec installations. The FAA specification won't tolerate equipment failure, especially fires. We have already had one fire started by the Indians' wind turbines.</p> <p>This fire started with complete destruction of the wind turbine, which apparently has no remote maintenance monitoring (fire or temperature) or fire suppression systems. Thank God the fire started on a calm, windless day (a rarity in Boulevard). Without the quick response of many fire agencies, including aircraft, this fire could easily have gotten out of control and burned East County, maybe into San Diego. It has happened before in the 1970's, as well as the more recent Cedar fire.</p> <p>Also, what a lovely sight that burned out windmill is to local and out of state travelers on Interstate 8. San Diego's tourism industry is supported by its beauty and atmosphere, not by ugly industrial projects and fear of wildfires.</p> <p>County Supervisors and Fire Management / Fire Chiefs please take note! We certainly don't need a tragedy like Yarnell, AZ. Nineteen fire fighters are dead because of an out of control wildfire, wind, and shortage of resources.</p> <p>2. WATER. You can't live and you can't extinguish fires without water. We are told it will take billions of gallons of water to construct the Soitec projects. We already used millions of gallons to construct the Sunrise Powerlink. What about the millions/billions needed to maintain and wash all of those panels? I have a shallow well of less than 100 feet. What am I to do when my well runs dry? We are told Soitec has no legal responsibility. What about the County? Will they drill me a deeper well 800 or 1000 feet deep (or more) so we can survive? Why would our President, Governor, Board of Supervisors and others would even think of a project like this when our state is in a State of Emergency over water?</p> <p>California water authorities state they may not be able to supply water to its cities due to the worst drought in 400 years. Emergency water restrictions are in effect for San Diego. We need water for farmers to grow food, look at the Central Valley.</p> <p>We drove for several hundred miles through dead fields of agriculture along Interstate 5, no water. I like to eat and you need water to grow food. All these billions of gallons of water San Diego County proposes to waste on Soitec might someday be all that SD County has to keep people alive. Lake Morena is almost empty and it's usually full at this time of year.</p> <p>Projects of this type should be placed on isolated Federal, State, and County land where no impact will be realized on citizens! Government owns millions of acres of such land. Use it. Not Boulevard or other communities where families live. This is a very close family community where families with children feel safe, except maybe for the sex offenders placed out here by the County.</p>	<p>temperature increase that would threaten to ignite vegetation is expected. In addition, the Proposed Project sites will be subject to fuel modification throughout, including under CPV trackers and on the perimeter of the Proposed Project sites, so vegetation growing up into the CPV trackers will not occur and maintenance consistent with the FPP will be enforced.</p> <p>The panels are constructed of materials with very high combustion temperatures. The operation of the panels does not approach these temperatures, so ignition of panels from the heat generated by operation would not be possible. The panels will be maintained and inspected at regular intervals for optimal performance. There is very little exposed wiring on the trackers, limited to areas around the electric motor at the tracker poles. The wiring in this area, if it overheated or was subjected to some other type of failure, could cause insulation to melt and drop to the ground. A cleared area maintained free of vegetation is required in this area. In addition, the fuel modification provided at the site combined with the road grid provides a layered and segmented landscape where ignitions would be very unlikely. If an ignition did occur, it would burn in a patchy manner and would, under most conditions, not burn beyond one of the internal roadways. Each solar farm site and all of its components are monitored by a computer system that would warn of an anomaly and maintenance would occur to minimize the</p>
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	<p>likelihood of wiring issues. See also the response to comment I91-5.</p> <p>It is worth noting that solar panel fires are extremely rare. From 2007 through 2011 there were a total of 30 solar panel-related fires in California. This is an average of six fires per year over the 5-year period, primarily associated with rooftop solar panels. Data obtained from the California Energy Commission indicates there are 78 photovoltaic plants (and a large number of other solar panels in private use) in operation in California. Solar statistics indicate that between 2007 and 2010, 47,335 solar panels (17,213 per year) were installed in California (http://www.californiasolarstatistics.ca.gov/reports/9-08-2010/AdminStats.html). Assuming that this rate continued during 2011 and 2012, there would be a total of over 86,000 solar panels since 2007. There are likely many more panels that were installed prior to 2007. Therefore, if there are six fires per year in 78 plants and some conservatively estimated 65,000 solar panels, that equals 0.077 fires per farm per year if all fires were associated with solar farms, or 0.00009 fires per year, when known solar panels installed during 2007 to 2011 are considered (this does not include older panels, which may be more prone to fires). Based on these statistics, solar farms would be expected to experience, at most, some type of fire about every 13 years and the 65,000 solar panels</p>
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	<p>installed between 2007 and 2011 would be expected to experience, at most, some type of fire about every 11,000 years. See also the response to comment O10-82 regarding electrical fires.</p> <p>Wildfires may occur in the area, but based on the available research and scientific principles applied to the risk evaluation, they would not be considered to have the ability to ignite the CPV trackers, which would be set back from off-site, higher British thermal unit-producing wildland fuels and would be provided fuel modification throughout the facilities.</p> <p>The remainder of the comment is noted but is not at issue with the environmental document.</p> <p>I57-3 Impacts related to groundwater use for construction and operation of the Proposed Project were considered and addressed in the DPEIR; see Section 3.1.5.3.4, Groundwater Resources, and Section 3.1.9.3.1, Water. The commenter did not provide factual data to support their comment related to the amount of ground water (billions of gallons of water for both construction and operational purposes) that would be required for the Proposed Project. Refer to response to comment I32-8 and common response WR1 and WR2.</p>
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<p>Water and Fire personnel, please, please take note! Our safety and health are in your hands!</p> <p>3. PROPERTY VALUES. Realtors tell me values have already dropped due to the Sunrise Powerlink. The Sunrise Powerlink fire mitigation grant speaks to this as increased fire danger and falling property values. Do you think the Soitec projects and increased SDG&E transformer, substations, and powerlink will not decrease them further?</p> <p>Soitec states this is a test of its product heavily subsidized by the federal government. Soitec is using Boulevard as a proving ground (Patrick Brown's words from Soitec). There are many abandoned test sites / proving grounds all over this country. In most cases the sites are abandoned in place leaving the old equipment and pollution to be cleaned up by others. Even the US Government does this; i.e. the Air Force radar site on Mount Laguna leaving all equipment, leaking fuel tanks, leaking transformers, etc.</p> <p>Will San Diego County and its taxpayers be saddled with the cleanup expense?</p> <p>4. HEALTH. I'm sure Soitec won't be using RoundUp to keep their sites weed free. They will probably be using ground sterilants. I have Type II Diabetes and Myasthenia Gravis caused by exposure in the military to Agent Orange and other chemicals in Trans oil. I don't need any more exposure to chemicals and herbicides. If you don't care about me, at least please think about the children and unborn.</p> <p>EMF – Here again my health and the health of the community is at great risk. This project should never be placed close to humans. I use medical equipment every night to sleep. What if you have a pacemaker or controlled diabetic injection? Experimental power projects should be placed on government land in the desert or over water so that there are no fire, public health, safety, wildlife, noise, property value issues and no degradation of community and family life.</p> <p>5. JOBS. This will create no jobs in Boulevard other than low paying labor. I know of only 1 other electrical engineer living in the area that would be technically qualified, other than me, to work on such systems.</p> <p>I will close as I know you folks will spend a lot of time (I hope) reading these comment letters. The bottom line is this project, especially with the amount of water to be used, does not belong in our community.</p> <p>Respectfully submitted,</p> <p>Bill and Peggy Hopkins</p>	<p>I57-4</p> <p>This comment raises concerns regarding property values. This topic was not evaluated in the DPEIR, since it is not related to environmental impacts. See California Environmental Quality Act (CEQA) Guidelines, Section 15131. However, this type of information can be presented to decision makers for their consideration during the hearing process for the Proposed Project.</p> <p>Decommissioning of the project sites is provided as part of the Proposed Project (see Chapter 1.0, Project Description, of the DPEIR). Additionally, as described in Chapter 1.0, in compliance with Section 6952.b.3(d) of the County Zoning Ordinance, the Proposed Project applicants would be required to provide surety to ensure removal of the components from the Proposed Project sites at the end of their useful life. Financial responsibility for decommissioning would be an obligation of the owners of the individual solar farms.</p> <p>I57-5</p> <p>As provided in Section 2.3, Biological Resources, of the DPEIR, “weed control treatments shall include any legally permitted chemical, manual, and mechanical methods applied with the authorization of the San Diego County agriculture commissioner” (DPEIR, p. S.0-26 [M-BI-PP-9]). The application of herbicides would be performed in compliance with all state and federal laws and regulations. Additionally, as described in Section 3.1.4, Hazards and Hazardous</p>
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	<p>Materials, any hazardous materials used on site, including maintenance chemicals, would be used, transported, and disposed of in accordance with federal, state, and local regulations. Based on the environmental analysis it is not expected that the use of hazardous materials on the Proposed Project would pose a hazard to the public or environment.</p> <p>The County acknowledges the commenter's concern associated with electric and magnetic fields (EMF). Recognizing there is a great deal of public interest and concern regarding potential health effects and hazards from exposure to EMFs, the DPEIR provides information regarding these potential issues; see Section 3.1.4.5 of the DPEIR. However, the DPEIR does not consider EMFs in the context of the CEQA for determination of environmental impact because there is no agreement among scientists that EMFs create a health risk and because there are no defined or adopted CEQA standards for defining health risks from EMFs. As a result, the EMF information is presented for the benefit of the public and decision makers. Furthermore, in response to this comment and other comments regarding EMF, a memorandum was prepared by Asher R. Sheppard, PhD, to support the information provided in the DPEIR and provide more detail; see Appendix X . The memorandum concludes that EMF from the Proposed Project are highly localized and pose no known concern for human health.</p>
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	<p>I57-6 This comment raises the concern of job creation. This topic was not evaluated in the DPEIR since it is not related to environmental impacts (see 14 CCR 15064(e)). The Rugged and Tierra del Sol solar farms have been certified as environmental leadership projects, which will create high-wage, highly skilled jobs that pay prevailing wages and living wages. (<i>See</i> Public Resources Code § 21183(b)).</p> <p>I57-7 This comment concludes the letter and does not raise a significant environmental issue for which a response is required.</p> <p>References 14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.</p> <p>County of San Diego Zoning Ordinance. 2010. Ordinance No. 10072, Section 6952, Solar Energy System.</p>
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